

HDM:JV/JKW/JPL  
F. #2020R00002

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

S U P E R S E D I N G  
I N F O R M A T I O N

- against -

DELA SAIDAZIM,  
also known as "Gina Payne"  
and "Eloise Pay,"

Defendant.

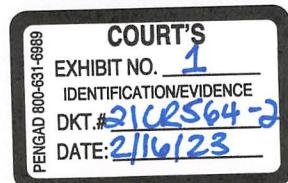
Cr. No. 21-564 (WFK) (S-2)  
(T. 18, U.S.C., §§ 371 and 3551 et seq.)

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THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Superseding Information, unless otherwise indicated:

CONSPIRACY TO COMMIT HEALTH CARE FRAUD

1. In or about and between October 2018 and March 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DELA SAIDAZIM, also known as "Gina Payne" and "Eloise Pay," together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more health care benefit programs, as defined in Title 18, United States Code, Section 24(b), to wit: various health insurance providers under which medical benefits, items and services were provided to individual beneficiaries (the "Health Insurance Providers"), and to obtain, by means of one or more materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of, one or more Health Insurance Providers, in connection with the delivery of and payment for health care benefits, items and services, contrary to Title 18, United States Code, Section 1347.



2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant DELA SAIDAZIM, also known as “Gina Payne” and “Eloise Pay,” together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

- (a) In or about 2019, SAIDAZIM, using the alias “Gina Payne,” recruited one or more doctors for the TeleCare Group, a purported telemedicine company.
- (b) On or about June 19, 2019, SAIDAZIM spoke with Individual-1, a physician whose identity is known to the United States Attorney, and recruited Individual-1 to work for the TeleCare Group reviewing consultation sheets and approving medications, without meeting with or examining the patients.
- (c) On or about June 20, 2019, SAIDAZIM sent Individual-1 an employment contract via interstate wires.
- (d) On or about October 11, 2019, SAIDAZIM, using the alias “Gina Payne,” emailed co-conspirator Hafizullah Ebady to request information concerning Pharmacy-1, a New York-based pharmacy the identity of which is known to the United States Attorney, and asked Ebady to obtain and forward, among other things, Pharmacy-1’s login information for accounts with multiple Health Insurance Providers, the Secretary of State and the State Board of Pharmacists, as well as the officers, pharmacists-in-charge, bank information and electronic fund transfer accounts registered by Pharmacy-1 with various entities.
- (e) On or about January 10, 2020, SAIDAZIM, using the alias “Gina Payne,” emailed an attorney representing the seller of Pharmacy-2, a Brooklyn, New York-based

pharmacy the identity of which is known to the United States Attorney, to finalize the amount to be paid at the sale closing and to arrange a call between the attorney and a co-conspirator.

(f) On or about July 20, 2020, SAIDAZIM, using the alias “Gina Payne,” sent a WhatsApp message to Individual-2, an individual whose identity is known to the United States Attorney, directing Individual-2 to fire a pharmacist working at Pharmacy-3, a New York City-based pharmacy the identity of which is known to the United States Attorney, because the employee appeared to be probing into Pharmacy-3’s practices.

(g) On or about May 10, 2021, SAIDAZIM, using the alias “Gina Payne,” sent a text message to Individual-2, directing Individual-2 to erase the contents of computers stored in Pharmacy-4, a New Jersey-based pharmacy the identity of which is known to the United States Attorney.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

*By Carolyn Pokorny, Assistant U.S. Attorney*

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BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. # 2020R00002  
FORM DBD-34  
JUN. 85

No. 21-CR-564 (WFK) (S-2)

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## UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

*vs.*

DELA SAIDAZIM,

Defendant.

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## SUPERSEDING INFORMATION

(T. 18, U.S.C., §§ 371 and 3551 et seq.))

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*A true bill.*

----- *Foreperson*

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*Filed in open court this ----- day,*

*of ----- A.D. 20 -----*

----- *Clerk*

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*Bail, \$ -----*

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*John Vagelatos, Jessica Weigel, Jonathan P. Lax, Assistant U.S. Attorneys  
(718) 254-6182/6157/6139*